

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JOHN WILSON, on behalf of himself and all others similarly situated,

Plaintiff,

v.

ANCESTRY.COM OPERATIONS INC., a Virginia Corporation; ANCESTRY.COM INC., a Delaware Corporation; and ANCESTRY.COM LLC, a Delaware limited liability company,

Defendants.

Case No.: 2:22-cv-00861 EAS (KAJ)

Judge: Hon. Edmund A. Sargus

Magistrate Judge Kimberly A. Jolson

**DEFENDANTS' MOTION FOR
RECONSIDERATION OF THEIR
MOTION TO DISMISS FOR LACK
OF PERSONAL JURISDICTION**

ORAL ARGUMENT REQUESTED

Defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC (collectively, “Ancestry”), respectfully submit this Motion for Reconsideration of Their Motion to Dismiss for Lack of Personal Jurisdiction. As shown in the accompanying Memorandum of Law, this Motion should be granted because intervening law, contrary to the Court’s previous ruling, has established a test that demonstrates the alleged in-forum contacts arising from the nationwide availability of Ancestry’s website are insufficient to establish personal jurisdiction over Ancestry. Ancestry thus respectfully requests the Court exercise its discretion to reconsider its prior interlocutory order and enter an order dismissing Ancestry for lack of personal jurisdiction.

DATED: February 15, 2024

Respectfully submitted,

/s/ Jennifer A. L. Battle

Jennifer A. L. Battle (Trial Attorney)
CARPENTER LIPPS LLP
280 N. High Street, Suite 1300
Columbus, OH 43215
Phone: (614) 365-4119
battle@carpenterlipps.com

Shon Morgan
John W. Baumann
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Phone: (213) 443-3000
Fax: (213) 443-3100
shonmorgan@quinnmanuel.com
jackbaumann@quinnmanuel.com

Cristina A. Henriquez
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Phone: (650) 801-5000
Fax: (650) 801-5100
cristinahenriquez@quinnmanuel.com

Attorneys for Defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC

CERTIFICATE OF SERVICE

I certify that on February 15, 2024 a true and correct copy of the foregoing was electronically filed with the Clerk of the United States District Court of the Southern District of Ohio, using the CM/ECF system, which will send notification of such filing to all counsel of record at the email addresses that they have provided to the Court.

DATED February 15, 2024.

/s/ Jennifer A. L. Battle
Jennifer A. L. Battle